

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS**

FILED-USDC-NDTX-DA
'24 JUL 11 PM 4:26
KMB

Junious Nielsen
Plaintiff

3-24CV1774-K

v.

Civil Action No.

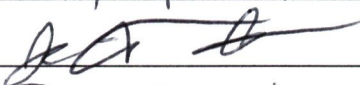
Regal Cinemas Inc.
Defendant

COMPLAINT

Plaintiff (Junious Nielsen) ^{has an} filing suit against Regal Cinemas corporation for violating employment CIVIL RIGHTS VEHRAA, Veteran Status, & USERRA Acts. During Junious Nielsen time working for Regal Cinemas from 01/01/2016 - 04/01/2016 he was Bullied and harassed from upper management for being a Veteran when he took time leave to Perform Military Duties. ~~On~~ On 01/09/2016, 01/10/2016, 02/07/2016, 03/05/2016, 03/09/2016, when Army Veteran Junious Nielsen returned back from duties he was fired without given notice.

* Attach additional pages as needed.

Plaintiff is seeking compensation damages for his wrongful termination in the amount of \$100,000 (pain suffering punitive damages).

Date 07/11/2024
Signature 
Print Name Junious Nielsen
Address 4300 Horizon North Pkwy
City, State, Zip Dallas TX 75287
Telephone (585) 743-2317

2:05 PM

Earnings Recor...
secure.ssa.gov

Unavailable

Employer Name: REGAL CINEMAS
INC VINCENT FUSCO

Employer Address: 101 E BLOUNT
AVE KNOXVILLE, TN 37920-1632

**Employer Identification Number
(EIN):** 62-1412720

Taxed Social Security Wages:
\$1,535

Taxed Medicare Wages: \$1,535

Total Compensation: \$1,535

Employer Name: ~~TARGET~~
~~CORPORATION~~ STEVEN LEE

Employer Address: ~~7000 TARGET~~
~~PKWY N # NGC 0153 BROOKLYN~~
~~PARK, MN 55415-4301~~

**Employer Identification Number
(EIN):** ~~41-0216170~~

Taxed Social Security Wages: ~~\$1,535~~

Taxed Medicare Wages: ~~\$1,535~~

Total Compensation: ~~\$1,535~~

Are these earnings incorrec
employer's information from the ye
containing incorrect earnings, the correct

Junias
Notes -
employment
Records
with
Regal.

J.C. Penney	Retail Salespersons	military. Cashier, sales, customer service, cleaning	11/01/2012	05/31/2016	Rochester, New York, United States
McDonald's	Combined Food Preparation and Serving Workers, Including Fast Food	Food Preparation	09/01/2013	12/01/2013	Greece, Rochester New York, United States
Sutherland Global	Customer Service Representatives	Confer with customers by telephone or in person to provide information about products or services, take or enter orders, cancel accounts, or obtain details of complaints.	06/01/2015	12/01/2015	Wallace Way, Rochester New York, United States
Walmart	Cashiers	customer service, stocking, cashier	07/01/2015	12/01/2015	3175 Dewey Ave, Rochester New York, United States
REGAL CINEMAS INC	Cashiers	cashier	01/01/2016	04/01/2016	7132 REGAL LN, KNOXVILLE Tennessee, United States
SECURITAS SECURITY	Security Guards	Security- watching around perimeter of	09/01/2016	05/31/2018	SERVICES USA INC, TALK UCM SERVICES INC/EQUIP

Copy
of
employment
Record

CIVIL COVER SHEET

3-24CV1774-K

The JS 44 civil cover sheet and the information contained herein neither replace nor supplement the filing and service of pleadings or other papers as required by law, except as provided by local rules of court. This form, approved by the Judicial Conference of the United States in September 1974, is required for the use of the Clerk of Court for the purpose of initiating the civil docket sheet. (SEE INSTRUCTIONS ON NEXT PAGE OF THIS FORM.)

I. (a) PLAINTIFFS

J. Unders Nelson

(b) County of Residence of First Listed Plaintiff

(EXCEPT IN U.S. PLAINTIFF CASES)

Dallas County

DEFENDANTS

Regal Chinas Inc

County of Residence of First Listed Defendant

(IN U.S. PLAINTIFF CASES ONLY)

Knox County

(c) Attorneys (Firm Name, Address, and Telephone Number)

Pto Se

RECEIVED

JUL 11 2024

NOTE: IN LAND CONDEMNATION CASES, USE THE LOCATION OF THE TRACT OF LAND INVOLVED.

Address:

7132 Regal LN Knoxville, TN 37918

II. BASIS OF JURISDICTION (Place an "X" in One Box Only)

☐ 1 U.S. Government Plaintiff☐ 3 Federal Question (U.S. Government Not Plaintiff)☐ 2 U.S. Government Defendant☒ 4 Diversity (Indicate Citizenship of Parties in Item III)

III. CITIZENSHIP OF PRINCIPAL PARTIES (Place an "X" in One Box for Plaintiff and One Box for Defendant)

Clerk, U.S. District Court Northern District of Texas

Citizen of Another State

Citizen or Subject of a Foreign Country

☒ 1 Incorporated or Principal Place of Business In This State☐ 2 Incorporated and Principal Place of Business In Another State☐ 3 Foreign Nation☐ 4☒ 5☐ 6

IV. NATURE OF SUIT (Place an "X" in One Box Only)

Click here for: Nature of Suit Code Descriptions.

CONTRACT	TORTS	FORFEITURE/PENALTY	BANKRUPTCY	OTHER STATUTES
<input type="checkbox"/> 110 Insurance <input type="checkbox"/> 120 Marine <input type="checkbox"/> 130 Miller Act <input type="checkbox"/> 140 Negotiable Instrument <input type="checkbox"/> 150 Recovery of Overpayment & Enforcement of Judgment <input type="checkbox"/> 151 Medicare Act <input type="checkbox"/> 152 Recovery of Defaulted Student Loans (Excludes Veterans) <input type="checkbox"/> 153 Recovery of Overpayment of Veteran's Benefits <input type="checkbox"/> 160 Stockholders' Suits <input type="checkbox"/> 190 Other Contract <input type="checkbox"/> 195 Contract Product Liability <input type="checkbox"/> 196 Franchise	PERSONAL INJURY <input type="checkbox"/> 310 Airplane <input type="checkbox"/> 315 Airplane Product Liability <input type="checkbox"/> 320 Assault, Libel & Slander <input type="checkbox"/> 330 Federal Employers' Liability <input type="checkbox"/> 340 Marine <input type="checkbox"/> 345 Marine Product Liability <input type="checkbox"/> 350 Motor Vehicle <input type="checkbox"/> 355 Motor Vehicle Product Liability <input type="checkbox"/> 360 Other Personal Injury <input type="checkbox"/> 362 Personal Injury - Medical Malpractice PERSONAL INJURY <input type="checkbox"/> 365 Personal Injury - Product Liability <input type="checkbox"/> 367 Health Care/Pharmaceutical Personal Injury Product Liability <input type="checkbox"/> 368 Asbestos Personal Injury Product Liability PERSONAL PROPERTY <input type="checkbox"/> 370 Other Fraud <input type="checkbox"/> 371 Truth in Lending <input type="checkbox"/> 380 Other Personal Property Damage <input type="checkbox"/> 385 Property Damage Product Liability	<input type="checkbox"/> 625 Drug Related Seizure of Property 21 USC 881 <input type="checkbox"/> 690 Other LABOR <input type="checkbox"/> 710 Fair Labor Standards Act <input type="checkbox"/> 720 Labor/Management Relations <input type="checkbox"/> 740 Railway Labor Act <input type="checkbox"/> 751 Family and Medical Leave Act <input type="checkbox"/> 790 Other Labor Litigation <input type="checkbox"/> 791 Employee Retirement Income Security Act IMMIGRATION <input type="checkbox"/> 462 Naturalization Application <input type="checkbox"/> 465 Other Immigration Actions	<input type="checkbox"/> 422 Appeal 28 USC 158 <input type="checkbox"/> 423 Withdrawal 28 USC 157 INTELLECTUAL PROPERTY RIGHTS <input type="checkbox"/> 820 Copyrights <input type="checkbox"/> 830 Patent <input type="checkbox"/> 835 Patent - Abbreviated New Drug Application <input type="checkbox"/> 840 Trademark <input type="checkbox"/> 880 Defend Trade Secrets Act of 2016 SOCIAL SECURITY <input type="checkbox"/> 861 HIA (1395ff) <input type="checkbox"/> 862 Black Lung (923) <input type="checkbox"/> 863 DIWC/DIWW (405(g)) <input type="checkbox"/> 864 SSID Title XVI <input type="checkbox"/> 865 RSI (405(g)) FEDERAL TAX SUITS <input type="checkbox"/> 870 Taxes (U.S. Plaintiff or Defendant) <input type="checkbox"/> 871 IRS—Third Party 26 USC 7609	<input type="checkbox"/> 375 False Claims Act <input type="checkbox"/> 376 Qui Tam (31 USC 3729(a)) <input type="checkbox"/> 400 State Reapportionment <input type="checkbox"/> 410 Antitrust <input type="checkbox"/> 430 Banks and Banking <input type="checkbox"/> 450 Commerce <input type="checkbox"/> 460 Deportation <input type="checkbox"/> 470 Racketeer Influenced and Corrupt Organizations <input type="checkbox"/> 480 Consumer Credit (15 USC 1681 or 1692) <input type="checkbox"/> 485 Telephone Consumer Protection Act <input type="checkbox"/> 490 Cable/Sat TV <input type="checkbox"/> 850 Securities/Commodities/Exchange <input type="checkbox"/> 890 Other Statutory Actions <input type="checkbox"/> 891 Agricultural Acts <input type="checkbox"/> 893 Environmental Matters <input type="checkbox"/> 895 Freedom of Information Act <input type="checkbox"/> 896 Arbitration <input type="checkbox"/> 899 Administrative Procedure Act/Review or Appeal of Agency Decision <input type="checkbox"/> 950 Constitutionality of State Statutes
REAL PROPERTY <input type="checkbox"/> 210 Land Condemnation <input type="checkbox"/> 220 Foreclosure <input type="checkbox"/> 230 Rent Lease & Ejectment <input type="checkbox"/> 240 Torts to Land <input type="checkbox"/> 245 Tort Product Liability <input type="checkbox"/> 290 All Other Real Property	CIVIL RIGHTS <input type="checkbox"/> 440 Other Civil Rights <input type="checkbox"/> 441 Voting <input checked="" type="checkbox"/> 442 Employment <input type="checkbox"/> 443 Housing/Accommodations <input type="checkbox"/> 445 Amer. w/Disabilities - Employment <input type="checkbox"/> 446 Amer. w/Disabilities - Other <input type="checkbox"/> 448 Education PRISONER PETITIONS Habeas Corpus: <input type="checkbox"/> 463 Alien Detainee <input type="checkbox"/> 510 Motions to Vacate Sentence <input type="checkbox"/> 530 General <input type="checkbox"/> 535 Death Penalty Other: <input type="checkbox"/> 540 Mandamus & Other <input type="checkbox"/> 550 Civil Rights <input type="checkbox"/> 555 Prison Condition <input type="checkbox"/> 560 Civil Detainee - Conditions of Confinement			

V. ORIGIN (Place an "X" in One Box Only)

☒ 1 Original Proceeding ☐ 2 Removed from State Court ☐ 3 Remanded from Appellate Court ☐ 4 Reinstated or Reopened ☐ 5 Transferred from Another District (specify) ☐ 6 Multidistrict Litigation - Transfer ☐ 8 Multidistrict Litigation - Direct File

VI. CAUSE OF ACTION

Cite the U.S. Civil Statute under which you are filing (Do not cite jurisdictional statutes unless diversity):

38 U.S. Code Chapter 43 USERRA act of 1994
Brief description of cause: employment discrimination 442

VII. REQUESTED IN COMPLAINT:

☐ CHECK IF THIS IS A CLASS ACTION UNDER RULE 23, F.R.Cv.P.

DEMAND \$

\$100,000

CHECK YES only if demanded in complaint:

JURY DEMAND: ☐ Yes ☒ No

VIII. RELATED CASE(S) IF ANY

(See instructions):

JUDGE

DOCKET NUMBER

DATE

SIGNATURE OF ATTORNEY OF RECORD

FOR OFFICE USE ONLY

RECEIPT # AMOUNT APPLYING IFP JUDGE MAG. JUDGE